## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

PATRICIA JOHNSON, FAUSTO CABRERA, VELLYN ANTONELLI, CARMEN FOX, MARK ANGELOPOULOS, DIANE ANDERSON JAMES COOLEY and MARGARET COOLEY, on behalf of themselves and all others similarly situated,	) ) ) ) ) (C.A. NO. 10-10316-RWZ ) )
Plaintiffs,	
vs.	
BAC HOME LOANS SERVICING, L.P.,	
a subsidiary of BANK OF AMERICA,	)
N.A.	
Defendant.	
Detelluant.	

## STATEMENT OF EXPERIENCE OF MICHAEL RAABE

- I, Michael Raabe, declare as follows:
- 1. I am an attorney at law duly admitted to practice in the Commonwealth of Massachusetts. I am a staff attorney at Neighborhood Legal Services, one of the counsel of record for the Plaintiffs in this action. I have personal knowledge of the matters stated below, and if called upon to do so could testify competently to them.
- 2. I make this declaration in support of Plaintiffs' Motion for Class Certification, particularly on the issue of adequacy of counsel pursuant to Fed. R. Civ. P. 23(a)(4).
- 3. Neighborhood Legal Services is a legal aid program that provides free legal services to low income people residing in Essex County and Northern Middlesex County.
- 4. I am a graduate of the University of Connecticut (1979) and New England School of Law (1985) and was admitted to practice law in Massachusetts on December 18, 1985.

5. I have worked for Neighborhood Legal Services since 1986 in the areas of public benefits, domestic relations and consumer law. I am also the manager of the Intake Unit which processes all requests for free legal services from residents of Essex County and Northern Middlesex County.

- Co-Counsel on this matter include the firms of Roddy, Klein and Ryan and the National Consumer Law Center.
- 7. I was co-counsel in the class action: *Thibault v. Department of Transitional Assistance*, Civil Action No. SUCV97-04740C (Mass Sup. Ct. Dec. 29, 1998).
- 8. Neighborhood Legal Services has been co-counsel in other class actions including

  Ernest E. AVERY, et al., v. Secretary Of Health And Human Services, 762 F.2d 158

  (1985) and Innocent Noundja, et al. v. Lynn Community Development Housing

  Corporation, et al., Civil Action No. 96-CV-00192 (Northeast Housing Court, 1996)
- I declare under penalty of perjury under the laws of the Commonwealth of Massachusetts that the foregoing is true and correct.
- 10. Executed this 20th day of August, 2010.

/s/ Michael Raabe \_\_\_\_\_\_ Michael Raabe (BBO 546107) NEIGHBORHOOD LEGAL SERVICES 170 Common Street, Suite 300 Lawrence, MA 01840

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